

1 Vanessa R. Waldref  
2 United States Attorney  
3 Eastern District of Washington  
4 Stephanie Van Marter  
5 Assistant United States Attorney  
6 Post Office Box 1494  
7 Spokane, WA 99210-1494  
8 Telephone: (509) 353-2767

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**Oct 18, 2022**

SEAN F. McAVOY, CLERK

9  
10 UNITED STATES DISTRICT COURT  
11 FOR THE EASTERN DISTRICT OF WASHINGTON  
12

13 UNITED STATES OF AMERICA,

4:22-CR-06043-MKD

14 Plaintiff,

SUPERSEDING INDICTMENT

15 v.

Vio.: 21 U.S.C. § 841(a)(1),  
(b)(1)(B)(vi)  
Distribution of 40 Grams or  
More of Fentanyl  
(Counts 1 and 2)

16 [REDACTED]  
17 GABRIELA CASARES (a/k/a  
"Gabriela Rosas"),

21 U.S.C. § 853  
Forfeiture Allegations

18 Defendants.  
19

20  
21 The Grand Jury charges:

22 COUNT 1

23 On or about June 8, 2022, in the Eastern District of Washington, the

24 Defendants, [REDACTED] GABRIELA CASARES

25 (a/k/a "Gabriela Rosas"), knowingly and intentionally distributed 40 grams or more of  
26 a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-  
27  
28

SUPERSEDING INDICTMENT – 1

1 phenylethyl)-4-piperidiny] propanamide (a/k/a fentanyl), a Schedule II controlled  
2 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).  
3

4 COUNT 2

5 On or about July 8, 2022, in the Eastern District of Washington, the Defendants,  
6 [REDACTED] GABRIELA CASARES (a/k/a “Gabriela  
7 Rosas”), knowingly and intentionally distributed 40 grams or more of a mixture or  
8 substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-  
9 piperidiny] propanamide (a/k/a fentanyl), a Schedule II controlled substance, in  
10 violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).  
11  
12

13 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS  
14

15 The allegations contained in this Indictment are hereby re-alleged and  
16 incorporated by reference for the purpose of alleging forfeitures.  
17

18 Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of  
19 21 U.S.C. § 841(a)(1), as charged in this Indictment, Defendants, [REDACTED]  
20

21 [REDACTED] GABRIELA CASARES (a/k/a “GABRIELA  
22 ROSAS”), shall forfeit to the United States of America, any property constituting, or  
23 derived from, any proceeds obtained, directly or indirectly, as the result of such  
24 offense(s) and any property used or intended to be used, in any manner or part, to  
25 commit or to facilitate the commission of the offense(s).  
26  
27

28 If any forfeitable property, as a result of any act or omission of the Defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

DATED: this \_\_\_\_ day of October 2022.

A TRUE BILL

\_\_\_\_\_  
Foreperson

\_\_\_\_\_  
Vanessa Waldref  
United States Attorney

\_\_\_\_\_  
Stephanie Van Marter  
Assistant United States Attorney